

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DANIEL TEPPER and REBECCA RUFO-
TEPPER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

SANTANDER BANK, N.A., and DOES 1
through 10, inclusive,

Defendants.

Case No. 7:20-cv-00501-KMK

JOINT STIPULATION TO EXTEND SETTLEMENT DEADLINES

The parties jointly submit this stipulation and proposed order to extend certain deadlines associated with the administration of the class action settlement agreed by the parties and preliminarily approved by the Court. In support of this request, the parties state as follows:

1. On June 14, 2022, the Court entered its Amended Order Preliminarily Approving Class Action Settlement, Granting Preliminary Certification of Settlement Class, and Providing for Notice (the “Order”).

2. Among other things, the Order set a schedule for providing notice to the class. Under the Order, notice was required to be provided within sixty days of the order—i.e., no later than August 15, 2022.

3. The parties have been working diligently with the settlement administrator to prepare for the notice date. Santander timely transferred the amount of estimated Administrative Costs (as required by Paragraph 9.b of the Order). Together, the parties and the settlement administrator have prepared the settlement website for launch by August 15, 2022 (as required

by Paragraph 9.c of the Order), and prepared the automated toll-free telephone line for class member inquiries (as required by Paragraph 9.d of the Order).

4. The parties have also been working diligently on the forms of direct notice to class members. However, due to unforeseen technical issues, Santander was not be able to send direct emails and short-form notices to class members with active mortgage accounts by August 15, 2022, as the parties contemplated.

5. Because the notice date is a court-ordered deadline, on August 12, 2022 the parties requested an extension of fourteen days to complete the Notice Program, as described in Paragraph 9.e of the Order, as well as an adjustment to all other dates relative to administration and final approval of the settlement. *See* ECF No. 53.

6. The parties now request a further extension of 10 additional days to complete the Notice Program, as well as a corresponding adjustment to all other dates relative to administration and final approval of the settlement. The parties accordingly propose the following revised calendar for administration and final approval of the settlement:

Settlement Event	Current Date	Proposed Revised Date
Notice Program Deadline	August 15, 2022	September 8, 2022
Opt-Out Deadline	September 29, 2022 (§11)	October 23, 2022
Objection Deadline	September 29, 2022 (§12)	October 23, 2022
Motion for Final Approval	September 15, 2022 (§23.a)	October 10, 2022
Fee & Expense Motion and Motion for Service Award	September 15, 2022 (§23.b)	October 10, 2022
Notices of Intention to Appear at Final Approval Hearing	October 23, 2022 (§23.e)	November 10, 2022
Administrator's Filings	October 17, 2022 (§23.f)	November 10, 2022
Response to Objections	October 20, 2022 (§23.g)	November 10, 2022
Final Approval Hearing	October 27, 2022 at 10 a.m. (§23.h)	November 14, 2022 at 10 a.m.

The parties respectfully request that the Court enter the attached proposed order amending the Order and adopting the revised dates to govern the administration of the settlement and final approval.

Dated: New York, New York
August 25, 2022

Respectfully submitted,

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[PROPOSED] ORDER EXTENDING SETTLEMENT DEADLINES

Upon consideration of the parties' Joint Stipulation Extending Settlement Deadlines, it is hereby ORDERED that the dates set forth in the Court's June 14, 2022 Amended Order Preliminarily Approving Class Action Settlement, Granting Preliminary Certification of Settlement Class, and Providing for Notice are extended as follows:

Settlement Event	Current Date	Proposed Revised Date
Notice Deadline	August 15, 2022	September 8, 2022
Opt-Out Deadline	September 29, 2022 (§11)	October 23, 2022
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IT IS SO ORDERED:

Hon. Kenneth M. Karas

September 2, 2022